

Electronic Mail sent 11/29/2003 to: Horst_Greczmiel@ceq.eop.gov

Horst,

Thank you for your work to refine the NEPA process. Fremont County has been and will be involved in a number of NEPA/planning processes and my observation is that the process could stand some improvement. Also, thank you for sending me a copy of the task force report. I am attaching several comments for your consideration. I would be willing to serve on a committee to study barriers to collaboration (cooperation), and on local government involvement.

Sincerely,

Doug Thompson

Comments on Modernizing NEPA Implementation

1. Throughout the document, the word "analyzes" is used instead of the appropriate word "analysis". The first is the act of analyzing, the second is the outcome of the process.
2. Since local and state governments are "cooperating agencies", it is more appropriate to use the word "cooperation", instead of "collaboration". Collaboration has a negative connotation in some quarters, i. e. collaborating with the enemy. Cooperation is a process of people of like purpose and mutual respect working together.
3. A definition of stakeholder needs to be included.
4. As the task force forms advisory committees as is recommended in the report, please give serious consideration to the inclusion of local government representatives. It would be good for the CEQ to practice what it is proposing to other federal agencies.
5. Development of a handbook on social, cultural, and economic analysis is an excellent goal.
6. The process of Adaptive Management and Monitoring needs to be fleshed out. Post-decisional involvement of state and local government representatives should be part of the process. All too often lead agencies form working groups to help develop a plan, but then fail to involve the working group in the implementation of the plan, which I believe is a fatal flaw or many federal resource management efforts. Post-decisional involvement provides continuity of expectation and accountability in the management.

7. An aspect of NEPA training not specifically addressed in the report, but which is very important, is education for cooperating agencies on the specific laws, regulations, and guidance used by the lead agency. For example, before a BLM RMP revision or Forest Plan revision, the state and local government representatives should learn what laws, regulations, guidance will be used as sideboards and boundaries for the range of alternatives.
8. Although Section 7.1.5 states "consensus for new definitions would probably not be reached", I believe a sincere effort needs to be made to have common definitions and process guidelines across federal agencies. As a local government representative, I can testify to the frustration of not having common definitions and shifting standards to deal with. This is a major factor affecting the trust relationship for cooperating agencies.